

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

SAMUEL KATZ, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

ALLIED FIRST BANK, SB  
et al.

Defendants.

Case No. 1:22-cv-05277

**JURY TRIAL DEMANDED**

**PLAINTIFF SAMUEL KATZ'S  
AGREED MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Fed. R. Civ. P. 5.2 and L.R. 26.2(c), Plaintiff Samuel Katz hereby respectfully moves this Court for an Order sealing an Exhibit of Discovery Documents to Plaintiff's Opposition Allied First's Motion for Summary Judgment. In support of his Motion to Seal, Katz states as follows:

1. Plaintiff Samuel Katz ("Plaintiff") filed this lawsuit on September 27, 2022.
2. On June 14, 2023, this Court entered an Agreed Confidentiality Order. (ECF No. 25).
3. Throughout the course of discovery, Allied First produced several hundred pages of documents which were marked "Confidential" in accordance with the requirements set forth and agreed to in the Confidentiality Order.
4. Katz filed his Opposition to Defendant's Motion for Summary Judgment concurrently with the instant Motion for Seal. In support of his Opposition to Defendant's Motion for Summary Judgment, Katz refers to 49 pages of documents that Allied First produced

in discovery and marked “Confidential,” including financial information (including account numbers), internal policy documents, and e-mail correspondences.

5. In accordance with the Confidentiality Order, and to protect the confidentiality of these documents, Katz respectfully requests that the Court issue an Order sealing the Exhibit of Discovery Documents attached to his Opposition to Defendant’s Motion for Summary Judgment.

6. On November 12, 2025, undersigned counsel conferred with counsel for Defendant who agreed to the relief requested herein.

WHEREFORE, for the reasons set forth above, Plaintiff Samuel Katz respectfully requests that the Court grant his Motion to Seal and for any other relief as justice requires.

Date: November 12, 2025

/s/ Andrew Roman Perrong

Andrew Roman Perrong, Esq.

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*Attorneys for Plaintiff and the Proposed Class*

**CERTIFICATE OF SERVICE**

We certify that we filed the foregoing via ECF on the below date, which will automatically send a copy to all attorneys of record on the case.

Dated: November 12, 2025

/s/ Andrew Roman Perrong

Andrew Roman Perrong, Esq.  
Perrong Law LLC

/s/ Anthony Paronich

Anthony Paronich  
PARONICH LAW, P.C.